

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 25-CV-20656-SINGHAL/Sanchez**

**RAVIPAL LUTHRA,**

**Plaintiff,**

**vs.**

**UNIVERSITY OF MIAMI,**

**Defendant.**

**/**

**DEFENDANT’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant, University of Miami (“University”), by and through undersigned counsel and with the consent of Plaintiff, Ravipal Luthra, respectfully requests a one-week extension of time to respond to the Complaint (D.E. 1). In support hereof, the University states as follows.

1. On February 12, 2025, Plaintiff commenced this lawsuit by filing his Complaint. (D.E. 1.)

2. On May 1, 2025, Plaintiff served the University with initial process. Under applicable rules, the University’s response to the Complaint is due on or before May 22, 2025.

3. Due to obligations in other matters (including a series of unanticipated, time-sensitive filings, which required the undersigned’s immediate response), the undersigned requires a brief extension of time to prepare the University’s response to the Complaint.

4. Accordingly, the University respectfully requests a one-week extension of time, through and including May 29, 2025, to file its response to the Complaint.

5. This request for an extension of time is made in good faith and not for purposes of delay. Further, no other Court deadlines would be affected by the extension.

6. Undersigned counsel has conferred with Plaintiff's counsel regarding the relief requested in this motion. Plaintiff does not oppose the requested extension.

7. Pursuant to S.D. Fla. L. R. 7.1(a)(2), a proposed order is submitted herewith.

WHEREFORE, the University respectfully requests an extension of time, through and including May 29, 2025, to file its response to the Complaint.

**CERTIFICATE OF CONFERENCE**

Pursuant to S.D. Fla. L. R. 7.1(a)(3), I hereby certify that, on May 22, 2025, I conferred with Plaintiff's counsel via e-mail in a good-faith effort to resolve the matters raised by this Motion. Plaintiff does not oppose the relief requested herein.

By: /s/ Christopher M. Yannuzzi  
Christopher M. Yannuzzi

Respectfully submitted,

**ISICOFF RAGATZ**  
601 Brickell Key Drive, Suite 750  
Miami, Florida 33131  
Tel: (305) 373-3232  
Fax: (305) 373-3233

By: /s/ Christopher M. Yannuzzi  
Eric D. Isicoff  
Florida Bar No. 372201  
[Isicoff@irlaw.com](mailto:Isicoff@irlaw.com)  
Teresa Ragatz  
Florida Bar No. 545170  
[Ragatz@irlaw.com](mailto:Ragatz@irlaw.com)  
Christopher M. Yannuzzi  
Florida Bar No. 92166  
[Yannuzzi@irlaw.com](mailto:Yannuzzi@irlaw.com)

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been served via  
CM/ECF this 22nd day of May, 2025, upon the following:

Daniel J. Barroukh  
Derek Smith Law Group, PLLC  
520 Brickell Key Drive, Suite O-301  
Miami, Florida 33131  
(305) 946-1884  
[danielb@dereksmithlaw.com](mailto:danielb@dereksmithlaw.com)

By: /s/ Christopher M. Yannuzzi  
Christopher M. Yannuzzi